UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a SHAREHOLDER.COM,

Plaintiff,

Civil Action No. 04-10535 PBS

v.

CCBN.COM, INC., THE THOMSON CORPORATION, JOHN DOES 1 through 5, and JANE DOES 1 through 5,

Defendants.

PLAINTIFF SHAREHOLDER.COM'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Pursuant to Rule 37 of the Federal Rule of Civil Procedure, Plaintiff Shareholder.com hereby moves that this Court compel defendants CCBN.com, Inc. and the Thomson Corporation to produce documents responsive to Request No. 13 of Shareholder.com's First Set of Requests for the Production of Documents and Things.

Pursuant to Local Rule 7.1, plaintiff's counsel certifies that they conferred with defendants' counsel and were unable to resolve the issues presented in this motion.

Respectfully submitted,

SHAREHOLDER.COM, INC.,

By its attorneys,

Thane D. Scott (BBO #449340) Ruth T. Dowling (BBO #645568) John T. Bennett (BBO # 648464) PALMER & DODGE LLP 111 Huntington Avenue Boston, MA 02199 (617) 239-0100

November 29, 2004